



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 20, 2018

BY ECF

Hon. Lorna G. Schofield
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Woney, 18 Cr. 832 (LGS)

Dear Judge Schofield:

The Government writes with the consent of counsel for the defendant, Ishi Woney, in response to the Court's November 16, 2018 Order directing the parties by November 20, 2018 to propose a (i) schedule for discovery; (ii) schedule for the filing of motions; and (iii) three proposed dates for a status conference.

The parties have conferred and propose the following:

(i) **Discovery schedule:**

The Government shall begin producing Rule 16 discovery relevant to any motion by the defendant that is in the Government's possession on or before the later of November 30, 2018, or the date of entry of a protective order governing discovery, and complete its production of Rule 16 discovery on or before December 28, 2018.¹

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¹ The Government has within its possession search warrant returns related to victims and that collectively total in excess of 20,000 printed pages and several Gigabytes of media. The Government is expeditiously reviewing those returns to identify pertinent information and records. The Government will produce any such returns subject to Rule 16 on a rolling basis.

(ii) **Motion Schedule:**

The defendant shall file motions, if any, by February 26, 2018;

The Government shall file its opposition to any motions by March 19, 2018; and

The defendant shall file its reply, if any, by March 26, 2019.

(iii) **Proposed Status Conference Dates:**

April 3, 2019

April 4, 2019

April 5, 2019

Finally, the Government requests that time under the Speedy Trial Act be excluded from November 19, 2018 through the date of the status conference so that the parties may discuss a possible disposition of this case and attend to their discovery obligations. The defendant consents to the exclusion of time.

Very truly yours,

GEOFFREY S. BERMAN
United States Attorney

by: /s/

Daniel H. Wolf
Assistant United States Attorney
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